

**LAW OFFICES OF BRONZE & TANG**

**A Professional Corporation**

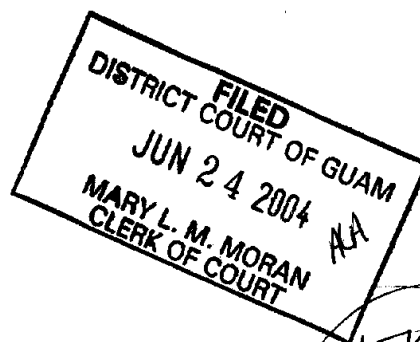
BankPacific Building, 2<sup>nd</sup> Floor

825 South Marine Corp Drive

Tamuning, Guam 96913

Telephone No.: (671) 646-2001

Facsimile No.: (671) 647-7671



*Attorneys for Defendant The Hongkong and Shanghai Banking Corporation Ltd.*

IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU  
SADHWANI, and K. SADHWANI'S  
INC., a Guam corporation,

Plaintiffs,

v.

HONGKONG AND SHANGHAI  
BANKING CORPORATION, LTD.,  
et al.,

Defendants.

CIVIL CASE NO. 03-00036

**HSBC's NOTICE OF *EX PARTE*  
APPLICATION AND *EX PARTE*  
APPLICATION FOR LETTERS OF  
REQUEST FOR TAKING THE  
DEPOSITION AND PRODUCTION  
OF DOCUMENTS OF VASHI  
JADWANI IN THE REPUBLIC OF  
THE PHILIPPINES**

**TO: Plaintiffs, and their attorneys of record, ARRIOLA, COWAN & ARRIOLA**

**NOTICE IS HEREBY GIVEN** that on \_\_\_\_\_, 2004, at the hour of \_\_\_\_\_m., Defendant Hongkong and Shanghai Banking Corporation, Limited ("HSBC"), will bring the following *Ex Parte* Application before the Court.

Concurrently with this *Ex Parte* Application, HSBC has filed an *Ex Parte* Motion for Letters of Request for Taking the Deposition and Production of Documents of Vashi Jadwani in the Republic of the Philippines.

This *Ex Parte* Application is supported by the pleadings previously filed in this case and by the record before this Court. Further grounds are also set forth in the Motion filed concurrently herewith, the Memorandum of Points and Authorities in Support of said Motion, and the documents on file herein all being incorporated herein by this reference. This *Ex Parte* Application is further supported by the Declaration of Jacques G. Bronze concurrently filed herewith.

DATED this 24<sup>th</sup> day of June 2004.

**LAW OFFICES OF BRONZE & TANG**  
**A Professional Corporation**

By: \_\_\_\_\_

  
**JACQUES G. BRONZE**

*Attorneys for Defendant The Hongkong and  
Shanghai Banking Corporation, Ltd.*